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6 Attorney for BRYAN JAMES GALLAGHER

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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 BRYAN JAMES GALLAGHER.  
14 Defendant.

Case No. 2:15-cr-028-JAD-PAL

**UNOPPOSED MOTION TO MODIFY**  
**A CONDITION OF PRETRIAL**  
**RELEASE**

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16 Defendant, BRYAN GALLAGHER, by and through his attorney of record, Monique  
17 Kirtley, Assistant Federal Public Defender, hereby files this Unopposed Motion to Modify a  
18 Condition of Pretrial Release to allow for travel outside of the United States.

19 1. On May 10, 2016, Mr. Gallagher filed a motion to modify his pretrial release  
20 condition which prohibited his travel outside of the United States. Specifically, Mr. Gallagher  
21 requested permission to travel to Puerto-Peñasco, Mexico from June 30, 2016 to July 05, 2016, to  
22 attend his best friend's wedding. CR # 43.

23 2. On May 16, 2016, Mr. Gallagher provided the government with his travel itinerary.

24 3. Upon receipt of Mr. Gallagher's travel itinerary, the government does not oppose  
25 Mr. Gallagher's request to modify his travel conditions to allow him to travel to Puerto-Peñasco,  
26 Mexico on the dates as listed above.

27 4. Based upon the government's non-opposition to Gallagher's Motion to Modify his

1 Pretrial Release Condition (CR # 43), the parties respectfully request that this Court amend Mr.  
2 Gallagher's travel restriction to allow him to travel to Puerto-Peñasco, Mexico on the dates listed  
3 above.

4  
5 DATED this 16<sup>th</sup> day of May, 2016.

6 RENE L. VALLADARES  
7 Federal Public Defender

8 By: /s/ Monique Kirtley

9 MONIQUE KIRTLEY  
10 Assistant Federal Public Defender  
11 Attorney for Bryan James Gallagher  
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15 IT IS SO ORDERED.

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: 5-16-2016  
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**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on May 16, 2016, he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY A CONDITION OF PRETRIAL RELEASE** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
PHILLIP N. SMITH JR.  
Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

/s/ Christopher Vergari  
Employee of the Federal Public Defender